

1 LAUREN M. BLAS, SBN 296823
 2 lblas@gibsondunn.com
 3 GIBSON, DUNN & CRUTCHER LLP
 4 333 South Grand Avenue
 5 Los Angeles, CA 90071-3197
 6 Telephone: 213.229.7000
 7 Facsimile: 213.229.7520

8 GEOFFREY SIGLER (*pro hac vice*)
 9 gsigler@gibsondunn.com
 10 DEREK KRAFT (*pro hac vice*)
 11 dkraft@gibsondunn.com
 12 GIBSON, DUNN & CRUTCHER LLP
 13 1050 Connecticut Avenue, N.W.
 14 Washington, D.C. 20036-5306
 15 Telephone: 202.955.8500
 16 Facsimile: 202.467.0539

17 Attorneys for Defendants
 18 UNITED BEHAVIORAL HEALTH and
 19 UNITEDHEALTHCARE INSURANCE
 20 COMPANY

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

LD, DB, BW, RH, and CJ, on behalf of
 themselves and all others similarly situated,

Plaintiffs,

v.

UNITEDHEALTHCARE INSURANCE
 COMPANY, a Connecticut Corporation,
 UNITED BEHAVIORAL HEALTH, a
 California Corporation, and MULTIPLAN,
 INC., a New York Corporation,

Defendants.

Case No. 4:20-cv-02254-YGR

**JOINT STATEMENT IN RESPONSE TO
 THE COURT'S ORDER DIRECTING
 PARTIES TO MEET AND CONFER
 REGARDING OUTSTANDING SEALING
 DISPUTES AT DKT. 461**

Hon. Yvonne Gonzalez Rogers

Complaint filed: April 2, 2020
 Third Amended Complaint filed: Sept. 10, 2021

1 Plaintiffs LD, DB, BW, RH and CJ, United Behavioral Health and United Healthcare Insurance
2 Company (“United Defendants”) and MultiPlan, Inc. (“MultiPlan”), collectively the “Parties,” to the
3 above-entitled action jointly submit this statement in response to the Court’s November 13, 2024 Order
4 Directing Parties to Meet and Confer Regarding Outstanding Sealing Disputes (Dkt. 461, the “Order”).

5 Pursuant to the Order, the Parties met and conferred on November 18, 2024 and November 20,
6 2024 and have selected “twenty (20) representative sealing requests that are representative of the
7 broader universe of disputes between the Parties.” Order at 1. United Defendants and MultiPlan have
8 each selected seven requests, and Plaintiffs have selected six requests. The sealing requests are detailed
9 in the chart attached as **Exhibit A**. The parties are available to assist the Court if it needs hard copies
10 of any materials, or any further information.

11 [signatures on next page]

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1 DATED: November 22, 2024

Respectfully submitted,

2 GIBSON, DUNN & CRUTCHER LLP

3 By: /s/ Derek Kraft

4 Derek Kraft

5 Attorneys for Defendants UNITED
6 BEHAVIORAL HEALTH and UNITED
7 HEALTHCARE INSURANCE COMPANY

8 DATED: November 22, 2024

PHELPS DUNBAR LLP

9 By: /s/ Errol J. King, Jr.

10 Errol J. King, Jr.

11 Attorneys for Defendant MULTIPLAN, INC.

12 ERROL J. KING, JR. (*admitted pro hac vice*)
13 PHELPS DUNBAR LLP
14 II City Plaza, 400 Convention Street, Suite 1100
15 Baton Rouge, Louisiana 70802
16 Telephone: (225) 376-0207
Facsimile: (225) 381-9197
Errol.King@phelps.com

17 Dated: November 22, 2024

ARNALL GOLDEN GREGORY LLP

19 By: /s/ Matthew Lavin

20 Matthew Lavin
21 Attorneys for PLAINTIFFS

1 **ATTESTATION PURSUANT TO LOCAL RULE 5-1**

2 I, Derek Kraft, am the ECF user whose identification and password are being used to file
3 this document. Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of
4 this document has been obtained from the other signatories hereto.

5 Dated: November 22, 2024

6 /s/ Derek Kraft

7 Derek Kraft

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